

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of the Commission's Rules to
Establish Rules and Policies Pertaining
to a Non-Voice, Non-Geostationary
Mobile-Satellite Service

CC Docket 92-76

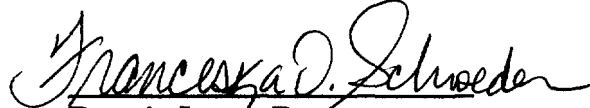
COMMENTS OF SPACE TECHNOLOGY SERVICES INTERNATIONAL

Space Technology Services International ("STSI") hereby submits its comments to the Federal Communications Commission ("FCC" or "Commission") in response to the Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding. STSI is a U.S. corporation that contemplates providing a U.S. radiolocation and two-way data messaging service to the long-haul trucking industry by using foreign-owned and operated satellites. STSI appreciates the proposed rules that the Commission has crafted for this service and offers brief comment in response to the NPRM.

STSI encourages the Commission to incorporate in its rule making language to ensure that a domestic service utilizing a foreign system has access to the U.S. market through U.S.-based ground facilities just as a foreign service utilizing a U.S. system would expect access to the foreign market through the use of foreign country-based ground segments. STSI believes that there should be sufficient flexibility in the rules to accommodate such services. As the FCC correctly noted in the NPRM, the proposed systems are international in nature and the success of a U.S. system may well depend upon its access to foreign markets. Access to such markets can be anticipated only if foreign system operators have access to U.S. markets in the same manner. STSI requests that the rules be amended accordingly.

Dated: April 26, 1993

Respectfully submitted,



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